

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

REBECCA TERRY,

Plaintiff,

v.

COUNTY OF MILWAUKEE, RICHARD SCHMIDT in his official capacity, OFFICER BRIAN WENZEL, JANE AND JOHN DOE, UNKNOWN EMPLOYEES OF MILWAUKEE COUNTY JAIL, JANE AND JOHN DOE, UNKNOWN JAIL SUPERVISORS, ARMOR CORRECTIONAL HEALTH SERVICES, CAROLYN EXUM, MORGAN BEVENUE, MARGARET HOOVER, JANE AND JOHN DOE, UNKNOWN EMPLOYEES OF ARMOR CORRECTIONAL HEALTH SERVICES, JANE AND JOHN DOE, UNKNOWN ARMOR HEALTHCARE SUPERVISORS,

Case No.: 17-cv-1112-JPS

Defendants.

**COUNTY DEFENDANTS' RULE 7(H) EXPEDITED NON-DISPOSITIVE MOTION
FOR LEAVE TO FILE CERTAIN DOCUMENTS UNDER RESTRICTION**

Defendants Milwaukee County, Acting Sheriff Richard Schmidt, Officer Brian Wenzel, Carolyn Exum, R.N., Morgan Bevenue, R.N., and Margaret Hoover, R.N., (collectively, "the County Defendants"), by their attorneys, move the Court pursuant to Local Rules 7(h) and 79(d) to restrict access to certain documents filed in support of their Motion for Summary Judgment. County Defendants submit as follows in support of the motion:

1. The parties have agreed to a Protective Order pursuant to which a party must file any document produced and designated as "CONFIDENTIAL" or "ATTORNEYS' EYES ONLY" under restriction. See ECF No. 45.

2. The County Defendants have on this date filed a Motion for Summary Judgment. County Defendants filed the Declaration of Douglas S. Knott in support of the motion. The Declaration attaches several exhibits, some of which the parties have produced under terms of confidentiality.

3. The undersigned respectfully submits that the following exhibits to the Declaration of Douglas S. Knott contain medical information of the Plaintiff that pursuant to the terms of the Protective Order the parties believe should not be made publicly available:

- a. Exhibit 4 – Plaintiff’s medical records – Milwaukee County Jail Aug. 2013;
- b. Exhibit 9 – Plaintiff’s deposition transcript – June 1, 2018;
- c. Exhibit 10 - Plaintiff’s medical records – Milwaukee County Jail March 9, 2014;
- d. Exhibit 11 – Plaintiff’s medical records – Froedtert Hospital March 2014;
- e. Exhibit 12 – Plaintiff’s medical records – Milwaukee County Jail March 10, 2014;
- f. Exhibit 13 – Deposition of Carolyn Exum with portions designated confidential;
- g. Exhibit 15 – Deposition of Margaret Hoover with portions designated confidential;
- h. Exhibit 25 – Plaintiff’s medical records – Milwaukee Fire Department March 10, 2014;
- i. Exhibit 26 – Plaintiff’s medical records – Aurora Sinai Hospital March 2014.

4. Counsel certifies pursuant to Local Rule 7(a)(2) that no papers or affidavits will be filed in support of this motion.

WHEREFORE, the County Defendants respectfully request the Court grant their motion to file the above-referenced materials under restriction.

Respectfully submitted,

LEIB KNOTT GAYNOR LLC

Dated: August 31, 2018

By: /s/ Douglas S. Knott

Douglas S. Knott, SBN 1001600

Cory J. Brewer, SBN 1105913

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